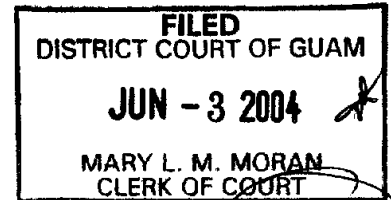


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU	)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S	)	<b>DECLARATION OF JACQUES</b>
INC., a Guam corporation,	)	<b>G. BRONZE IN SUPPORT OF</b>
	)	<b>EX PARTE APPLICATION ON</b>
Plaintiffs,	)	<b>MOTION TO STAY ORDER</b>
	)	<b>GRANTING, IN PART,</b>
v.	)	<b>MOTION TO COMPEL</b>
	)	<b>PENDING RULING BY</b>
HONGKONG AND SHANGHAI	)	<b>DISTRICT JUDGE ON</b>
BANKING CORPORATION, LTD.,	)	<b>HSBC'S OBJECTIONS</b>
et al.,	)	
	)	
Defendants.	)	
_____	)	

I, JACQUES G. BRONZE, do hereby declare as follows:

1. I am over the age of eighteen (18) years and competent to make this Declaration. I have personal knowledge of the matters stated herein and would be competent to testify thereto at any proceedings.

2. I am admitted to practice before this Court and am counsel responsible for the representation of Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC"). A good faith effort has been made by counsel to advise counsel for

**ORIGINAL**

Plaintiffs of the substance of HSBC's Ex Parte Application on Motion to Stay Order Granting, In Part, Motion to Compel Pending Ruling By District Judge on HSBC's Objections ("Ex Parte Application"). Copies of all pleadings relating to the Ex Parte Application and underlying Motion have been or will be served upon Plaintiffs' counsel on filing with this Court. The date and time the Court will consider the Ex Parte Application is not yet known. However, as soon as such information is made available to my office we will advise Plaintiffs' attorneys.

3. It is expected that counsel for Plaintiffs will oppose the Ex Parte Application and will desire to be present if and when the Ex Parte Application is either presented to or heard by the Court.

4. It is important and urgent that the Ex Parte Application and underlying Motion be heard as soon as possible because HSBC's right to have objections to the Order filed herein on May 27, 2004, granting, in part, Plaintiffs' motion to compel ("Order") determined by the district judge will be nullified and rendered moot if a stay is not granted. Since compliance with the Order and production of the documents is required on June 4, 2004, a number of days before HSBC is even required to file its objections under Rule 72(a), it would be impossible for the district judge to consider, much less rule upon, HSBC's objections before the date of compliance. If HSBC complies with the Order on June 4 and produces the documents which are the subject

of the objections, then the objections are rendered moot and HSBC's rights under Rule 72(a) will have been nullified.

5. This Declaration is made in compliance with Local Rule 7.1(j)(1).

I declare under penalty of perjury under the laws of the United States and Guam that the foregoing is true and correct.

Dated this 3<sup>rd</sup> day of June, 2004.

  
\_\_\_\_\_  
JACQUES G. BRONZE